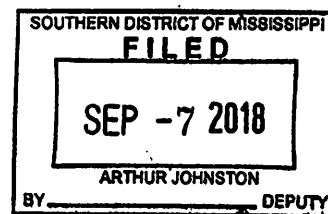


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

**DEFENDANT CHARLES LEARY'S
PRO SE MOTION MOTION TO EXTEND DEADLINES AND ALTER DATES
AND IN THE ALTERNATIVE FOR NOTATION OF DEFAULT**

COMES NOW Defendant and Plaintiff by counterclaim **Charles Leary**, appearing *pro se*, and files this his Motion respectfully requesting that the Court postpone trial until a reasonable time after the close of pleadings based on the Federal Rules of Civil Procedure and the chronology of steps in a civil case embodied therein. In addition, Dr. Leary asks that the Court order the Clerk to note Mr. Handshoe in default for filing a dispositive motion after the dispositive motion deadline in the Case Management Order, not filing a responsive pleading by the deadline mandated by the Federal Rules of Civil Procedure, and not filing any motion to extend deadlines. The Case Management Order in combination with Federal Rules of Civil Procedure 12(a)(1) and 12(a)(4) make Mr. Handshoe in default. Mr. Handshoe has intentionally

not taken the steps necessary to assure that is not in default. A brief on these issues accompanies this motion.

RESPECTFULLY SUBMITTED, this the 5th day of September, 2018.



CHARLES LEARY, DEFENDANT

appearing *pro se*

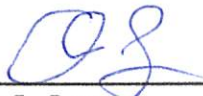
308 5th Ave E
Vancouver, BC V5T 1H4
Canada

802-440-0213
foodvacation@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that, on Sept 5, 2018, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]



Charles L. Leary